

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF SARA B.
TOMEZSKO IN FURTHER SUPPORT
OF MOTION FOR PROTECTIVE
ORDER AND TO QUASH SUBPOENA**

I, SARA B. TOMEZSKO, subject to the penalties by law for perjury, do hereby declare the following to be true and correct on the basis of my personal knowledge. If called upon to do so, I would be competent to testify to the matters set forth in this declaration.

1. I am an associate at Paul Hastings LLP, a member in good standing of the Bar of the State of New York, and outside counsel for Defendant in this matter. My firm also represents Diane Greene for purposes of her deposition noticed in this matter.

2. Attached to my declaration as Exhibit 1 are excerpts from the transcript of the deposition of Tariq Shaukat, which took place on October 15, 2020.

3. Attached to my declaration as Exhibit 2 are excerpts from the transcript of the deposition of Brian Stevens, which took place on November 13, 2020.

4. Attached to my declaration as Exhibit 3 is a true and correct copy of plaintiff's notice to depose a 30(b)(6) witness in this matter. Topics 5 through 7 relate to internal complaints of gender discrimination. Google identified the Head of Employee Relations, Bernita Jamison, as the person most knowledgeable to speak about those topics. Ms. Jamison was deposed on October 23, 2020.

5. Attached to my declaration as Exhibit 4 is a true and correct copy of a document produced in this matter Bates labeled GOOG-ROWE-00017427-28.

6. On August 14, 2020, Google produced to plaintiff documents sufficient to show the substance of complaints alleging gender discrimination related to compensation, promotion, or alleging retaliation for opposing gender discrimination or participating in an investigation concerning allegations of gender discrimination within the last five years at Google's New York office, as reflected in Google's internal systems. On October 13, 2020, Google made a production of Employee Relations investigators' interview notes and other related documents associated with that category of complaints.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

Signed on the 4th day of December, 2020 in Jersey City, New Jersey.


Sara Tomezsko